

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

Yi Li,

Plaintiff,

v.

Trump Campaign Staff, World Market Center, United States Secret Service,
Las Vegas Metropolitan Police Department (LVMPD), and John Does 1-10,
Defendants.

Case No.: _____

COMPLAINT

DEMAND FOR JURY TRIAL

COMPLAINT

Plaintiff, Yi Li, appearing pro se, brings this action against Defendants Trump Campaign Staff, World Market Center, United States Secret Service, Las Vegas Metropolitan Police Department (LVMPD), and John Does 1-10, for violations of federal and state law arising from an incident on September 13, 2024, at a political rally at the Expo at the World Market Center in Las Vegas, Nevada, pursuant to NRCP 8 and LR 10-1. Plaintiff alleges as follows:

JURISDICTION AND VENUE

1. This Court has federal question jurisdiction under 28 U.S.C. § 1331 for claims arising under 42 U.S.C. § 1983, the First Amendment, Fourth Amendment, and *Bivens v. Six Unknown Named Agents*, 403 U.S. 388 (1971).
2. This Court has supplemental jurisdiction over state law claims under 28 U.S.C. § 1367, as they form part of the same case or controversy.

3. Venue is proper in the District of Nevada under 28 U.S.C. § 1391(b), as the events occurred in Las Vegas, Nevada.

PARTIES

4. Plaintiff, Yi Li, is an individual residing at 5230 E. Craig Rd. 420, Sunrise Manor, NV 89115.
5. Defendant Trump Campaign Staff includes security personnel and organizers, including John Does 1-3, acting on behalf of the 2024 Trump political campaign.
6. Defendant World Market Center is the venue operator of the Expo at the World Market Center, Las Vegas, Nevada.
7. Defendant United States Secret Service includes federal agents, including John Does 4-5, involved in the incident.
8. Defendant Las Vegas Metropolitan Police Department (LVMPD) is a municipal law enforcement agency, including John Doe 6, an officer involved in the incident.
9. Defendants John Does 1-10 are unidentified individuals or entities who participated in the alleged acts.

FACTUAL ALLEGATIONS

10. On September 13, 2024, Plaintiff attended a public political rally at the Expo at the World Market Center, organized by the Trump Campaign.
11. Plaintiff complied with event directives, carried no weapons, and adhered to the absence of a dress code, arriving with work-related gear.

12. Defendants subjected Plaintiff to unlawful treatment, including harassment, assault, false imprisonment, false arrest, excessive force, and retaliation for protected speech.
13. Harassment (Trump Campaign Staff and World Market Center):
 - (a) Security personnel made demeaning comments about Plaintiff's appearance.
 - (b) Security removed Plaintiff, claiming Plaintiff was "suspicious" without basis.
 - (c) Other attendees were not targeted, suggesting discriminatory intent.
14. Criminal Assault and Invasion of Privacy (Trump Campaign Staff):
 - (a) A security officer demanded to see Plaintiff's phone screen and forced Plaintiff to lift their shirt, exposing their abdomen.
15. False Imprisonment (Trump Campaign Staff):
 - (a) Security personnel surrounded Plaintiff, restricting movement despite compliance.
16. False Arrest and Battery (LVMPD):
 - (a) An LVMPD officer grabbed, shoved, and handcuffed Plaintiff after Plaintiff's protected speech, detaining Plaintiff for approximately 20 minutes.
 - (b) The officer failed to activate their body-worn camera, violating LVMPD policy.
17. Excessive Force and Retaliation (LVMPD and Secret Service):
 - (a) The LVMPD officer's actions constituted excessive force and retaliation for Plaintiff's speech.
 - (b) Secret Service agents directed campaign staff to target Plaintiff.
18. Public Accommodation Discrimination (World Market Center):
 - (a) The venue failed to prevent discriminatory conduct.

19. Civil Conspiracy (All Defendants):

(a) Defendants conspired to violate Plaintiff's rights through coordinated actions.

20. Plaintiff notified World Market Center and Secret Service to preserve evidence.

21. LVMPD refused Plaintiff's police report, breaching its duty.

22. Plaintiff suffered emotional distress, humiliation, and physical discomfort, with damages estimated at \$10,000,000.

CAUSES OF ACTION

Count 1: Harassment (State Law) Defendants Trump Campaign Staff and World Market Center harassed Plaintiff based on appearance and race.

Count 2: Assault and Invasion of Privacy (State Law) Trump Campaign Staff's actions constituted assault and invasion of privacy.

Count 3: False Imprisonment (State Law) Trump Campaign Staff unlawfully restricted Plaintiff's movement.

Count 4: False Arrest (State Law) LVMPD falsely arrested Plaintiff for exercising free speech.

Count 5: Battery (State Law) LVMPD's officer committed battery.

Count 6: Excessive Force and Retaliation (42 U.S.C. § 1983) LVMPD violated Plaintiff's First and Fourth Amendment rights.

Count 7: Unreasonable Search and Seizure (42 U.S.C. § 1983) LVMPD and Secret Service conducted an unreasonable search and seizure.

Count 8: Public Accommodation Harassment (State Law) World Market Center failed to ensure a non-discriminatory environment.

Count 9: First Amendment Retaliation (42 U.S.C. § 1983) LVMPD and Secret Service retaliated against Plaintiff's speech.

Count 10: Intentional Infliction of Emotional Distress (State Law) Defendants' actions caused severe emotional distress.

Count 11: Trespass to Person (State Law) Defendants' actions constituted trespass to Plaintiff's person.

Count 12: Invasion of Privacy (State Law) Defendants' intrusive actions violated Plaintiff's privacy.

Count 13: Bivens Claim (Federal Law) Secret Service agents violated Plaintiff's Fourth Amendment rights.

Count 14: Civil Conspiracy (42 U.S.C. § 1983 and State Law) Defendants conspired to violate Plaintiff's rights.

Count 15: Conspiracy with State Actors (42 U.S.C. § 1983) Trump Campaign Staff and Secret Service conspired with LVMPD.

Count 16: Civil Intrusion (State Law) Defendants' actions constituted civil intrusion.

PRELIMINARY ESTIMATE OF FAULT

39. Fault distribution:

- World Market Center: 5%
- Trump Campaign Staff: 40%
- LVMPD: 35%
- Secret Service: 20%

PRAYER FOR RELIEF

Plaintiff requests:

1. Compensatory damages of \$11,000,000;
2. Punitive damages;
3. Injunctive relief to preserve evidence;
4. Declaratory relief finding Defendants' actions unlawful;
5. Costs and fees (if applicable);
6. Other relief as deemed just.

DEMAND FOR JURY TRIAL

Plaintiff demands a jury trial on all triable issues, pursuant to NRCP 38.

VERIFICATION

I, Yi Li, declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge.

Dated: July 21, 2025

/s/ Yi Li

Yi Li

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